U.S. Department of the Interior Bureau of Land Management Little Snake Field Office 455 Emerson Street Craig, CO 81625

# DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2014-0018-DNA

PROJECT NAME: Teepee Prescribed Burn

### LEGAL DESCRIPTION:

COUNTY AND GENERAL LOCATION: The project area is located on Douglas Mountain, four miles southeast of Greystone, CO in Moffat County.

T7N R100W sections 20, 21, 27 – 29, 33

347 acres BLM 152 acres private 499 acres total

APPLICANT: BLM

## A. Describe the Proposed Action

It is proposed to conduct a prescribed burn in Teepee Draw located on Douglas Mountain. The purpose is to remove sagebrush and decadent plant material (primarily standing dead leafy spurge) in order to make herbicide application for the control of leafy spurge more effective. Secondary purposes are to reduce the wildfire threat to cabins and structures located in Teepee Draw and range and wildlife habitat improvement.

The burn may be conducted in the spring or fall, but spring is preferred. Ground based ignition methods would be utilized. All design features and mitigation specified in environmental analysis DOI-BLM-CO-N010-2013-0056-EA, Douglas Mountain Fuels Treatment, would be followed.

Prescribed burning must be carried out in accordance with the Interagency Prescribed Fire Planning and Implementation Procedures Guide. This guide requires that a prescribed burn plan be completed that describes exactly how and under what conditions prescribed burning would occur in order to meet stated resource and fire management goals and objectives. The prescribed fire would also be conducted in accordance with the State of Colorado Smoke Management Plan and MOU, and would be regulated under Colorado Department of Public Health and Environment, Air Pollution Control Division. The Air Pollution Control Division

would issue an open burning permit, which specifies smoke dispersal conditions and other stipulations under which burning may occur.

Following burning, approximately 124 acres would be treated with herbicide to control leafy spurge which was established in the area many years ago and is continuing to spread. Herbicides that may be utilized include Tordon, and 2,4-D, and Plateau. Herbicides may be applied aerially or by UTV. Any herbicide application would be done in compliance with Little Snake Field Office Integrated Pest Management Plan, # DOI-BLM-CO-N010-2009-0025-EA.

### B. Land Use Plan (LUP) Conformance

LUP Name: <u>Little Snake Record of Decision and Approved Resource Management Plan</u>

(RMP)

Date Approved: October, 2011

Final RMP/EIS, August, 2010

Draft RMP/EIS, January, 2007

The Proposed Action is in conformance with the LUP because it is specifically provided for in the following LUP goals, objectives, and management decisions:

### Section/Page:

Wildland Fire Management - page RMP-27.

Give first priority to protection of life or property. Objectives for achieving this goal include:

- Identify and reduce hazardous fuels, with an emphasis on urban interface areas. Create an integrated approach to fire and resource management to meet land health standards. Objectives for achieving this goal include:
- Reduce fire hazards in ecosystems and restore ecological community functions.
- Use fire and allow it to protect, maintain, and enhance resources.
- Use fire and allow it to function in its ecological role when appropriate for the site and situation.

# Vegetation – page RMP-15

Collaborate with stakeholders and resource users in providing an array of habitats, suitably distributed across the landscape, that support biodiversity and viable populations of native plant and animal species. Objectives for achieving this goal include:

- Manage for a diversity of seral stages within plant communities.
- Manage for connections between varieties of plant communities on a landscape scale.
- Restore natural disturbance regimes, such as fire, and use vegetation treatments to accomplish biodiversity

Reduce the Occurrence of noxious and undesirable plant species. Integrate weed management across landscape and ownership boundaries. Objectives for achieving these goals include:

- Ensure all land use actions that could potentially increase the occurrence of noxious weeds are conducted by using BMPs.
- Apply principles of integrated pest management.
- Pursue whenever possible, the use of cooperative agreements to coordinate weed management actions.

# C. Identify applicable NEPA documents and other related documents that cover the proposed action.

DOI-BLM-CO-N010-2009-0025-EA, Little Snake Field Office Integrated Pest Management Plan.

DOI-BLM-CO-N010-2013-0056-EA, Douglas Mountain Fuels Treatment.

The Federal Land Policy and Management Act of 1976, as Amended (43 USC 1752)

Federal Land Assistance, Management and Assistance Act of 2009.

Northwest Colorado Fire Management Program Fire Management Plan.

Colorado Public Land Health Standards, Decision Record & Finding of No Significant Impact and Environmental Assessment, March 1997.

### D. NEPA Adequacy Criteria

- 1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document? All aspects of the proposed action were analyzed in the two environmental analysis listed above. The project is located within the planning areas identified in DOI-BLM-CO-N010-2013-0056-EA and DOI-BLM-CO-N010-2009-0025-EA.
- 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values? Many methods of fuels reduction were considered as well as various noxious weed treatment options. A No action alternative was also considered.
- **3.** Is the existing analysis valid in light of any new information or circumstances? DOI-BLM-CO-N010-2013-0056-EA was just completed this month and there is no new information or circumstances that would affect the analysis done in DOI-BLM-CO-N010-2009-0025-EA.

Subject to WO-IM 2011-154 and in accordance with BLM policy, some of the proposed project areas fall within an area being managed to protect lands with wilderness characteristics. The proposed action may impact but not impair wilderness characteristics; however, actions to control the expansion of invasive exotic species are appropriate and consistent with applicable requirements of law and other resource management considerations, and are approved by the field manager.

- **4.** Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? The proposed action is very typical for what was analyzed in the two environmental assessments; therefore the methodology and analytical approach is appropriate.
- 5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action? There are no known environmental impacts from this proposed action that are any different than that identified in the two referenced environmental assessments. The proposed action's site fits within the described design features and affected environment identified in both environmental assessments.
- 6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)? The referenced environmental assessments adequately address cumulative impacts for prescribed fire and herbicide application for this type of site.
- 7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? The proposed action is not controversial and affected landowners and permittees have been contacted and are supportive of the project.

### E. Interdisciplinary Analysis:

Title	Resource	Date
Ecologist	Air Quality, Floodplains	ES
	Prime/Unique Farmlands, Soils,	3/17/14
	Water Quality – Surface,	
	Wetlands/Riparian Zones	
Archaeologist	Cultural Resources, Native American	BN
	Concerns	8/18/14
Realty Specialist	Environmental Justice	LM
		3/18/14
Environmental	Hazardous Materials	DB
Coord. NEPA		3/20/14
Rangeland	Invasive Non-native Species	CR
Management Spec.		3/18/14
Rangeland	Sensitive Plants, T&E Plant	ARH
Management Spec.		3/24/14
Wildlife Biologist	T&E Animal	DMA
		3/17/14
Geologist	Water Quality - Ground	TJW
		6/24/14
Recreation	WSA, W&S Rivers, ACECs	GMR
Specialist		

		3/24/14
Wildlife Biologist	Animal Communities	DMA
		3/17/14
Wildlife Biologist	Special Status, T&E Animal	DMA
		3/17/14
Rangeland	Plant Communities	CR
Management Spec		3/18/14
Rangeland	Special Status, T&E Plant	ARH
Management Spec		3/24/14
Ecologist	Riparian Systems	ES
		3/17/14
Ecologist	Water Quality	ES
		3/17/14
Ecologist	Upland Soils	ES
		3/17/14

#### **Land Health Assessment**

This action has been reviewed for conformance with the BLM's Public Land Health Standards adopted February 12, 1997. This action will not adversely affect achievement of the Public Land Health Standards and should help to improve identified deficiencies. Standards Assessment was conducted in June 2004 by 4 rangeland management specialists, three wildlife biologists, and one soil/water/air specialist.

### **Conclusion**

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Signature of Lead Specialist			Date	
Signature of NEPA Coordinator		Date_		
Signature of the Authorizing Official	Tim J Wilson Tim Wilson, Acting Field Office Manager	Date_	9/5/14	

Note: The signed <u>Conclusion</u> on this document is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

